1	JENNY L. FOLEY, Ph.D., ESQ. Nevada Bar No. 9017		
2	HKM EMPLOYMENT ATTORNEYS LLP		
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4	Tel: (702) 625-3893 Fax: (702) 625-3893		
5	E-mail: jfoley@hkm.com		
6	Attorney for Plaintiff UNITED STATES DISTRICT COURT		
7	DISTRICT OF NEVADA		
8			
9	COLLEEN HARRINGTON, An Individual) CASE NO. 2:18-cv-00009-APG-PAL		
10	Plaintiff,		
11	vs.		
12	STATE OF NEVADA, ex rel. COLLEGE)		
13	OF SOUTHERN NEVADA, DOES I-X.		
14	Defendants.		
15			
16	STIPULATION AND ORDER TO EXTEND THE TIME TO RESPOND TO		
	DEFENDANT'S MOTION TO DISMISS (FIRST REQUEST)		
17			
18	COMES NOW, the Plaintiff, COLLEEN HARRINGTON ("Harrington"), by and		
19	through her attorney, JENNY L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT		
20	ATTORNEYS LLP, and Defendant, STATE OF NEVADA, ex rel. COLLEGE OF		
21	SOUTHERN NEVADA ("CSN"), by and through its attorney, DIANE L. WELCH, ESQ., of		
22	OFFICE OF GENERAL COUNSEL FOR THE COLLEGE OF SOUTHERN NEVADA,		
23	hereby stipulate and agree as follows:		
24			
25	1. That the Opposition to the Defendant's Motion to Dismiss due on February 19 th ,		
26	2018, may be due on February 22 nd , 2018.		
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1	2. That the Reply to the Oppositi	on to the Defendant's Partial Motion to Dismiss	
2	be due on March 8, 2018.		
3	3. This extension of time is made	in good faith and not for purpose of delay and is	
5	based on Plaintiff's council currently undergoing a family emergency.		
6	4. This is the first request for an e	extension of time in this matter.	
7			
8	Dated this <u>20th</u> day of February, 2018.	Dated this20 th day of February,	
9	2018.		
10	HKM Employment Attorneys LLP	Office of General Counsel	
11			
12 13	Jenny L. Foley Jenny L. Foley, Ph.D., Esq.	_/s/ Diane L. Welch Diane L. Welch, Esq.	
$\begin{bmatrix} 13 \\ 14 \end{bmatrix}$	Nevada Bar No. 9017 1785 East Sahara Ave., Suite 325	Nevada Bar No. 11738 6375 W. Charleston Blvd.	
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1	<u>ORDER</u>		
2	The Court having reviewed the foregoing STIPULATION AND ORDER TO EXTEND		
3	THE TIME TO RESPOND TO DEFENDANT'S MOTION TO DISMISS in the above-entitled		
4	matter and for good cause appearing therefor,		
5	IT IS SO ORDERED that the Opposition to the Defendant's Partial Motion to Dismiss		
6	shall be due on February 22 nd , 2018;		
7			
8	IT IS SO ORDERED that the Reply to the Opposition to the Defendant's Partial		
9	Motion to Dismiss shall be due on March 8, 2018.		
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14	Dated: 2/20/2018		
15			
16	al		
17	UNITED STATES DISTRICT JUDGE		
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19	Respectfully submitted by: HKM Employment Attorneys LLP		
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21	/s/Jenny L. Foley		
22	Jenny L. Foley, Ph.D., Esq. Nevada Bar No. 9017		
23	1785 East Sahara Ave, Suite 325 Las Vegas, Nevada 89104		
24	Attorney for Plaintiff		
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26 27 28			